ESTTA Tracking number:

ESTTA871406

Filing date:

01/17/2018

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding.	91226726
Applicant	Plaintiff Taza Systems, LLC
Other Party	Defendant Gottlieb Realty LLC
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	Yes

## Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Close of Discovery is currently set to close on 03/07/2018. Taza Systems, LLC requests that such date be extended for 30 days, or until 04/06/2018, and that all subsequent dates be reset accordingly.

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosure Due:	03/07/2018
Discovery Closes:	04/06/2018
Plaintiff's Pretrial Disclosures :	05/21/2018
Plaintiff's 30-day Trial Period Ends:	07/05/2018
Defendant's Pretrial Disclosures :	07/20/2018
Defendant's 30-day Trial Period Ends :	09/03/2018
Plaintiff's Rebuttal Disclosures :	09/18/2018
Plaintiff's 15-day Rebuttal Period Ends :	10/18/2018

The grounds for this request are as follows:

Taza Systems, LLC has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Taza Systems, LLC has provided an email address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

## **Certificate of Service**

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address of record by First Class Mail or Priority Mail Express on this date.

Respectfully submitted,

/edward saadi/

Parties are unable to complete discovery/testimony during assigned period

Edward T. Saadi, Esq. EdwardSaadi@aol.com mhuq@pryorcashman.com 01/17/2018